

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

MISSISSIPPI STATE CONFERENCE OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE; DR.
ANDREA WESLEY; DR. JOSEPH WESLEY;
ROBERT EVANS; GARY FREDERICKS; PAMELA
HAMNER; BARBARA FINN; OTHO BARNES;
SHIRLINDA ROBERTSON; SANDRA SMITH;
DEBORAH HULITT; RODESTA TUMBLIN; DR.
KIA JONES; MARCELEAN ARRINGTON;
VICTORIA ROBERTSON,

Plaintiffs,

vs.

STATE BOARD OF ELECTION COMMISSIONERS;
TATE REEVES, *in his official capacity as Governor of
Mississippi*; LYNN FITCH, *in her official capacity as
Attorney General of Mississippi*; MICHAEL WATSON,
*in his official capacity as Secretary of State of
Mississippi*,

Defendants,

AND

MISSISSIPPI REPUBLICAN EXECUTIVE
COMMITTEE,

Intervenor-Defendant.

**CIVIL ACTION NO.
3:22-cv-734-DPJ-HSO-LHS**

**MOTION BY DESOTO COUNTY FOR LEAVE TO FILE AMICUS CURIAE BRIEF IN
SUPPORT OF PLAINTIFFS' OBJECTIONS TO REMEDIAL REDISTRICTING PLANS**

DeSoto County, Mississippi ("DeSoto County") respectfully requests leave to file an amicus curiae brief objecting to the remedial redistricting plans recently adopted by the Mississippi Legislature, stating the following in support:

1. DeSoto County is a political subdivision of the State of Mississippi and has a significant interest in maintaining constitutional representation for its citizens in the Mississippi Legislature.

2. With particular regard to DeSoto County, the Senate District 1 and Senate District 11 remedial maps dismantle communities of interest, disregard natural geographical boundaries, and distort commonsense cartography. It is apparent from the face of the maps for Districts 1 and 11 that the Legislature subordinated these traditional metrics of redistricting, and this amicus curiae brief is necessary to defend traditional districting principles and the rights of DeSoto County's citizens.

3. In support of this Motion, DeSoto County offers a supporting memorandum of law as well as the following exhibit: **Exhibit 1**, Proposed Amicus Curiae Brief.

For these reasons, and those more fully explained in its supporting memorandum, DeSoto County respectfully requests leave of this Court to file the attached Amicus Curiae Brief in support of Plaintiffs' objections to the Remedial Redistricting Plan.¹

Dated: March 14, 2025.

Respectfully submitted,

PHELPS DUNBAR LLP

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¹ On March 12, Undersigned counsel contacted counsel for the parties in this case to request whether they would oppose this Motion for Leave. While counsel for Defendants could not determine whether Defendants would oppose this request for leave and reserved the right to oppose the request at a later date, counsel for Plaintiffs stated they would not oppose this request.

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Attorneys for DeSoto County, Mississippi

CERTIFICATE OF SERVICE

I certify that on March 14, 2025, I electronically filed this document with the Clerk of the Court using the ECF system, which sent notification of such filing to all ECF counsel of record in this action:

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